



ATTORNEYS AT LAW

Wanchoo Law Offices, LLP

14 Penn Plaza
225 West 34th Street, 9th Floor
New York, NY 10122
Telephone: (646) 593-8866
Facsimile: (646) 355-0244

rwanchoo@wanchoolaw.com

24, Old Chimney Road
Upper Saddle River
New Jersey - 07458
Telephone: (201) 783-8560
Facsimile: (646) 355-0244

www.wanchoolaw.com

October 20, 2021

VIA ECF

Honorable Ronnie Abrams
United States District Court
40 Foley Square, Room 2203
New York, NY 10007

RE: Liberty Highrise Pvt. Ltd. v. Praxis Energy Agents DMCC and Praxis Energy Agents Pte. Ltd., 20-cv-02427-RA

Dear Judge Abrams:

We represent the Plaintiff, Liberty Highrise Pvt. Ltd. (“the Plaintiff”), in the above-referenced matter. We write in response to Your Honor’s Order of yesterday’s date requesting that the Parties update the Court on the status of the case.

On August 18, 2021, your Honor signed an Order granting Mr. J. Stephen Simms’ request to withdraw as counsel for Praxis Singapore, as his client has ceased operation and was not in a position to pay counsel fees. Mr. Simms also advised the Court that Praxis Singapore would not be appointing substitute counsel.

The Plaintiff has recently learnt that while the Defendants Praxis Dubai and Praxis Singapore have ceased operations, a third entity – Praxis Energy Agents LLC (“Praxis USA”) – is still operating from its offices in Houston, Texas. Our search shows that, on September 10, 2021, in *Platina Bulk Carriers Pte Ltd. v. Praxis Energy Agents DMCC (Praxis Dubai)*, et. al., 2021 WL 4137528 (NRB), Judge Buchwald (who referenced our case) held that the Plaintiff Platina made a *prima facie* showing that Praxis USA and Praxis Singapore were alter egos of Praxis Dubai (*Id.* at *12). Our search of the Docket also shows that Mr. Simms has filed an Answer on behalf of Praxis USA.

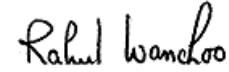
In light of these recent findings, we respectfully request that the Court grant the Plaintiff leave to amend the Complaint to include Praxis USA and Theodosios Kyriazis (Director and sole shareholder of the three (3) Praxis companies) as additional defendants. In the absence of these two additional parties in the case, the Plaintiff’s prospects of recovering its debt will be gravely prejudiced.

We also respectfully request that the Court adjourn the post-discovery conference scheduled for October 22, 2021, as the Plaintiff has been unable to take the deposition of Mr. Kyriazis following the withdrawal of Praxis’ counsel.

We thank the Court for its consideration in this matter.

Respectfully submitted,

WANCHOO LAW OFFICES, LLP



Rahul Wanchoo